

Phil J. Montoya, Jr. (SBN 124085)
HAWKINS PARNELL & YOUNG LLP
445 South Figueroa Street, Suite 3200
Los Angeles, CA 90071
Telephone: 213.486.8020
Facsimile: 213.486.8080
Email: pmontoya@hpylaw.com

Matthew A. Boyd (*pro hac vice*)
HAWKINS PARNELL & YOUNG LLP
303 Peachtree Street NE, Suite 4000
Atlanta, GA 30308
Telephone: 404.614.7400
Facsimile: 404.614.7500
Email: mboyd@hpylaw.com

Ashley R. Presson (*pro hac vice*)
HAWKINS PARNELL & YOUNG LLP
2705 Bee Caves Rd., Suite 220
Austin, TX 78746
Telephone: 512.687.6900
Facsimile: 512.687.6990
Email: apresson@hpylaw.com

Attorneys for Plaintiff
KHOROS, LLC

A. Marisa Chun (SBN 160351)
CROWELL & MORING LLP
3 Embarcadero Center, 26th Floor
San Francisco, CA 94111
Telephone: 415.986.2800
Facsimile: 415.986.2827
Email: MChun@crowell.com

Mark A. Klapow (*pro hac vice*)
Astor Henry Lloyd Heaven (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004-2595
Telephone: 202.624.2500
Facsimile: 202.628.5116
Emails: MKlapow@crowell.com
AHeaven@crowell.com

Valerie M. Goo (SBN 187334)
CROWELL & MORING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Telephone: 213.622.4750
Facsimile: 213.622.2690
Email: VGoo@crowell.com

Attorneys for Defendants
LENOVO (UNITED STATES), INC.
LENOVO SINGAPORE PTE. LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KHOROS, LLC,

Plaintiff,

v.

LENOVO SINGAPORE PTE LTD.,
LENOVO HK SERVICES, LTD., and
LENOVO (UNITED STATES), INC.,

Defendants.

Case No. 3:20-cv-03399-WHO

**JOINT STIPULATION AND [PROPOSED]
ORDER TO AMEND BRIEFING
SCHEDULE FOR PLAINTIFF KHOROS,
LLC'S MOTION FOR PRELIMINARY
INJUNCTION AND REQUEST FOR
EXPEDITED DISCOVERY;
DECLARATION OF MARISA CHUN**

[Civ. L.R. 6-2; Dkt. No. 22]

Judge: Hon. William H. Orrick

Complaint filed: May 19, 2020

1 WHEREAS, on June 15, 2020, Plaintiff Khoros, LLC (“Plaintiff”) filed a Motion for
 2 Preliminary Injunction and Request for Expedited Discovery (“Motion for Preliminary
 3 Injunction”) as to all named defendants in the above-captioned matter, and the current deadlines
 4 to file opposition and reply briefs are June 29, 2020 and July 6, 2020, respectively [Dkt. No. 22];

5 WHEREAS, defendant Lenovo HK Services, Ltd. has not yet appeared in the case and
 6 defendants Lenovo Singapore Pte. Ltd. and Lenovo HK Services, Ltd. have not been formally
 7 served with the Motion for Preliminary Injunction;

8 WHEREAS, the parties agree that coordinated opposition and reply briefing for all
 9 defendants is in the interests of judicial economy and efficiency;

10 WHEREAS, the stipulated change to the briefing schedule for the Motion for Preliminary
 11 Injunction will not alter the date of any event or any deadline already fixed by Court order;

12 NOW THEREFORE, PURSUANT TO CIVIL LOCAL RULE 6-2, IT IS HEREBY
 13 STIPULATED AND AGREED, by and between the attorneys for the parties, as follows:

- 14 1. Defendants’ deadline to file their oppositions to Plaintiff’s Motion for Preliminary
 15 Injunction and Request for Expedited Discovery shall be continued by seven (7) days
 16 such that any oppositions shall be filed on or before July 6, 2020;
- 17 2. Plaintiff Khoros, LLC will file its reply in support of its Motion for Preliminary
 18 Injunction and Request for Expedited Discovery on or before July 13, 2020;
- 19 3. The hearing of Plaintiff’s Motion for Preliminary Injunction and Request for
 20 Expedited Discovery, set for August 12, 2020 at 2:00 pm, will remain unchanged.
- 21 4. The filing of this joint stipulation or anything herein shall not be deemed to constitute
 22 a waiver of any rights, claims, defenses, motions or objections that any party may have
 23 or make with respect to jurisdiction (including, but not limited to, personal
 24 jurisdiction), venue and/or the claims set forth in this action.

25 **IT IS SO STIPULATED.**

26

27

28

Dated: June 25, 2020

HAWKINS PARNELL & YOUNG LLP

By: /s/ Matthew A. Boyd

Matthew A. Boyd
Attorneys for Plaintiff
KHOROS, LLC

Dated: June 25, 2020

CROWELL & MORING LLP

By: /s/ A. Marisa Chun

A. Marisa Chun
Attorneys for Defendant
LENOVO (UNITED STATES), INC. and
SINGAPORE PTE. LTD.

DECLARATION OF A. MARISA CHUN IN SUPPORT OF JOINT STIPULATION

I, A. Marisa Chun, declare as follows, pursuant to Civil Local Rule 6-2, in support of the Parties' Joint Stipulation to Amend Briefing Schedule for Plaintiff Khoros, LLC's Motion for Preliminary Injunction and Request for Expedited Discovery:

1. I am a partner at Crowell & Moring LLP, counsel for defendants Lenovo (United States), Inc. and Lenovo Singapore Pte. Ltd. If called as a witness, I could and would be able to testify to the matters below.
2. On June 15, 2020, Plaintiff Khoros, LLC ("Plaintiff") filed a Motion for Preliminary Injunction and Request for Expedited Discovery ("Motion for Preliminary Injunction") as to all named defendants in the above-captioned matter and the current deadlines for defendant Lenovo (United States), Inc. to file its opposition is June 29, 2020 and for Khoros to file its reply is July 6, 2020, respectively. *See* Dkt. No. 22.
3. Defendants Lenovo HK Services, Ltd. has not yet appeared in this action and Defendants Lenovo Singapore Pte. Ltd. and Lenovo HK Services, Ltd. have not been formally served with the Motion for Preliminary Injunction and supporting papers.
4. The parties have met and conferred and agree that coordinated opposition and reply briefing for all defendants is in the interests of judicial economy and efficiency.
5. The parties have not previously requested an extension of time in connection with briefing

relating to Plaintiff's Motion for Preliminary Injunction.

6. The stipulated change to the briefing schedule for Plaintiff's Motion for Preliminary Injunction will not alter the date of any event or any deadline already fixed by the Court, including the currently noticed hearing date of August 12, 2020 for the above Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 25, 2020, in San Francisco, California.

/s/ A. Marisa Chun

A. Marisa Chun

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that the other above-named signatory concurs in this filing.

Dated: June 25, 2020

CROWELL & MORING LLP

By: */s/ A. Marisa Chun*

A. Marisa Chun

Attorneys for Defendant

LENOVO SINGAPORE Pte. Ltd.

[PROPOSED] ORDER

Having considered the parties' Joint Stipulation to Amend the Briefing Schedule for Plaintiff's Motion for Preliminary Injunction and Request for Expedited Discovery [Dkt. No. 22], the Court finds good cause and, pursuant to stipulation, ORDERS the following new deadlines:

1. Defendants shall file opposition briefs to Plaintiff's Motion for Preliminary Injunction and Request for Expedited Discovery on or before July 6, 2020;
2. Plaintiff shall file its reply brief on or before July 13, 2020;
3. The hearing for the Motion for Preliminary Injunction and Request for Expedited Discovery, currently set for August 12, 2020 at 2:00 pm, shall remain unchanged.

IT IS SO ORDERED.

Dated: July 5, 2020


HONORABLE WILLIAM H. ORRICK
United States District Judge